## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JANE DOE 1 and JANE DOE 2, on behalf of themselves and all similarly situated women,

Plaintiffs,

-against-

THE CITY OF NEW YORK and BENNY SANTIAGO,

Defendants.

15 Civ. 3849 (AKH)

## NOTICE OF JOINT MOTION FOR A PROTECTIVE ORDER

PLEASE TAKE NOTICE that upon the attached Declaration of Danielle P. Mindlin and the exhibits annexed thereto, and the attached Memorandum of Law in Support of the Parties' Joint Motion for a Protective Order, and upon all the pleadings heretofore filed in this action, the undersigned will move the Court, at the U.S. Courthouse, 500 Pearl Street, New York, New York, as soon as counsel can be heard, pursuant to Federal Rule of Civil Procedure 26(c), for an order entering a protective order in this matter.

Dated: New York, New York July 20, 2015

CLEARY GOTTLIEB STEEN & HAMILTON LLP

3у:

Mitchell A. Lowenthal mlowenthal@cgsh.com

One Liberty Plaza New York, New York 10006

Tel: (212) 225-2000

Of Counsel:

Josh E. Anderson
jeanderson@cgsh.com
Danielle P. Mindlin
dmindlin@cgsh.com

THE LEGAL AID SOCIETY
William D. Gibney
wdgibey@legal-aid.org
Marlen S. Bodden
mbodden@legal-aid.org
Barbara P. Hamilton
bphamilton@legal-aid.org

199 Water Street, 6th Floor New York, New York 10038 Tel: (212) 577-3300

Attorneys for Plaintiffs

CITY OF NEW YORK LAW DEPARTMENT

**3**y:

kjoyce@law.nyc.gov

100 Church Street New York, New York 10007 Tel: (212) 356-2650

Attorneys for the City of New York

KOEHLER & ISAACS LLP

By: \_\_\_\_

Julie A. Ortiz jortiz@koehler-isaacs.com

61 Broadway, 25<sup>th</sup> Floor New York, New York 10006 Tel: (917) 551-1317

Attorneys for Benny Santiago

Of Counsel:

Josh E. Anderson jeanderson@cgsh.com Danielle P. Mindlin dmindlin@cgsh.com

> THE LEGAL AID SOCIETY William D. Gibney wdgibey@legal-aid.org Marlen S. Bodden mbodden@legal-aid.org Barbara P. Hamilton bphamilton@legal-aid.org

199 Water Street, 6th Floor New York, New York 10038 Tel: (212) 577-3300

Attorneys for Plaintiffs

CITY OF NEW YORK LAW DEPARTMENT

By:

Kimberly M. Joyce kjoyce@law.nyc.gov

100 Church Street New York, New York 10007 Tel: (212) 356-2650

Attorneys for the City of New York

KOEHLER & ISAACS LLP

Julie A. Ortiz jortizakoehler-isaacs.com

61 Broadway, 25th Floor New York, New York 10006

Tel: (917) 551-1317

Attorneys for Benny Santiago